

**REMARKS/ARGUMENTS**

Claims 1-17 are pending in the present application. In the Office Action mailed September 6, 2006, the Examiner rejected claims 1-17 under 35 U.S.C. § 102.

Claims 1, 4 and 6-17 have been amended generally to replace the term “driver” with “printer driver.” Support for these amendments may be found throughout Applicant’s Specification, such as on page 2, lines 3-6 and page 9, lines 13-16.

Reconsideration is respectfully requested in view of the above amendments to the claims and the following remarks.

**A. Claims 1-17 Rejected Under 35 U.S.C. § 102(b)**

The Examiner rejected claims 1-17 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent Application Publication No. 2003/0041238 to French et al. (hereinafter, “French”). This rejection is respectfully traversed.

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” MPEP § 2131 (*citing Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)). “The identical invention must be shown in as complete detail as is contained in the ... claim.” *Id.* (*citing Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989)). In addition, “the reference must be enabling and describe the applicant’s claimed invention sufficiently to have placed it in possession of a person of ordinary skill in the field of the invention.” *In re Paulsen*, 31 USPQ2d 1671, 1673 (Fed. Cir. 1994).

Applicant respectfully submits that the claims at issue are patentably distinct from French. French does not disclose all of the limitations in these claims.

Claims 1 has been amended to recite “discovering printer drivers” and “building a printer driver database comprising data identifying at least one MFP each printer driver is applicable to.” Support for these amendments may be found throughout Applicant’s Specification, such as on page 2, lines 3-6 and page 9, lines 13-16. Claim 1 has also been amended to recite “wherein the

relationship database further comprises a first MFP record and a first printer driver record; and wherein the first MFP record and the first printer driver record are associated as an allowable combination.” Support for this amendment may be found on page 4, lines 7-8 and lines 13-17. Applicant respectfully submits that French does not disclose these claim limitations. Specifically, French does not disclose “discovering printer drivers” or that “the first MFP record and the first printer driver record are associated as an allowable combination” as recited in claim 1.

The Office Action asserts that French discloses “discovering drivers.” Office Action, page 2. In support of this assertion, the Office Action cited two portions of French. The first portion of French states:

In general, the objects require some type of processing, input/output, or storage capability from the hardware resources. The objects may execute on the same device to which the hardware resource is connected, or the objects may be physically dispersed throughout a distributed computing environment. The objects request access to the hardware resource in a variety of manners, e.g. operating system calls to device drivers. Hardware resources are generally available on a first-come, first-serve basis in conjunction with some type of arbitration scheme to ensure that the requests for resources are fairly handled. In some cases, priority may be given to certain requesters, but in most implementations, all requests are eventually processed.

French, paragraph [0064]. Nothing in this cited paragraph discloses anything about “discovering printer drivers,” as recited in claim 1. In fact, nothing in this cited portion discloses “discovering” any type of driver, as recited in claim 1. Rather, this portion merely discloses that “objects request access to the hardware resource in a variety of manners, e.g. operating system calls to device drivers.” However, the fact that the operating system makes calls to the device drivers does not disclose “discovering printer drivers,” as recited in claim 1.

The second cited portion of French states:

With reference now to FIG. 2E, a diagram depicts the logical relationships between components within a system management framework that includes two endpoints and a gateway. FIG. 2E shows more detail of the relationship between components at an endpoint. Network 250 includes gateway 251 and endpoints 252 and 253, which contain similar components, as indicated by the similar reference numerals used in the figure. An

endpoint may support a set of applications 254 that use services provided by the distributed kernel services 255, which may rely upon a set of platform-specific operating system resources 256. Operating system resources may include TCP/IP-type resources, SNMP-type resources, and other types of resources. For example, a subset of TCP/IP-type resources may be a line printer (LPR) resource that allows an endpoint to receive print jobs from other endpoints. Applications 254 may also provide self-defined sets of resources that are accessible to other endpoints. Network device drivers 257 send and receive data through NIC hardware 258 to support communication at the endpoint.

Id. at paragraph [0077]. Like the previously cited portion, nothing in this second cited portion discloses anything about “discovering printer drivers,” as recited in claim 1. Rather, this portion merely discloses the use of “a line printer (LPR) resource” and “[n]etwork device drivers 257.”

However, nothing in this cited portion discloses that the “[n]etwork device drivers 257” or the “line printer (LPR) resource[s]” are “discover[ed],” as recited in claim 1. Likewise, nothing in this cited portion discloses that the network device drivers 257 or the line printer (LPR) resource are a “printer driver,” as recited in claim 1. Rather, the network device driver is just that, a network device driver and the line printer (LPR) resource merely “allows an endpoint to receive print jobs from other endpoints.” Furthermore, the Office Action has not cited, nor can Applicant find, any portion of French that discloses “discovering printer drivers,” as recited in claim 1.

The Office Action asserts that French discloses “building a relationship database comprising an associated MFP/driver record for each allowable combination.” Office Action, page 2. In support of this assertion, the Office Action cited two additional portions of French. The first portion of French states:

The major advantage of the IP mapper is that it allows the topology service to remain “generic”; topology remains a service for a variety of components to use rather than having to contain IP driver-specific logic. The topology service provides four types of objects to its customers: Aggregate Topology Objects, Topology Objects, Resources, and Relationships. IP mapper allows the topology service to work independently of IP driver through the following means. First of all, IP mapper creates its own resources to use, so that the topology service does not have to provide resource types. Resources and their associated data fields are declared in an

XML file. IP mapper declares four types of resources: networks, systems, routers, and endpoints. Each created resource dictates the image displayed to represent the resource as well as what data is contained by a resource. Secondly, IP mapper creates Aggregate Topology Objects to represent each network, system, or router that IP driver discovers. Relationships are then formed between the systems, networks, and routers in which they reside. Third, discovered endpoints are represented by Topology Objects, and relationships are created between the endpoints and the systems and routers they reside in. Finally, if a system or router contains endpoints that reside in separate networks, virtual resources must be created. Virtual resources reside inside a network, and appear just as a system or router would but actually link back to the original router or system so that data is not duplicated and the rules of which administrators can administrate objects managed by a particular IP driver can be enforced.

French, paragraph [0107]. Applicant respectfully submits that nothing in this first cited portion discloses anything about “the first MFP record and the first printer driver record [being] associated as an allowable combination,” as recited in claim 1. Rather, this first cited portion merely discloses that “relationships are created between the endpoints and the systems and routers they reside in.” However, creating relationships between the endpoints and the systems and routers they reside in is not “building a relationship database” where “the first MFP record and the first printer driver record are associated as an allowable combination,” as recited in claim 1, because “the first printer driver record” is not an endpoint, system, or router as disclosed by French. Rather an endpoint is a location on a network and a router is just that, a router. Therefore “the first printer driver record” is not an endpoint or router.

“[T]he first printer driver record,” as recited in claim 1, is also not a “system,” as disclosed by French. French uses the terms “network management system” and “system” interchangeably. See id., paragraph [0011] (“In a typical **network management system** of possibly thousands of devices, the system may contain a security context for the network administrator”) (emphasis added) see also id. at paragraph [0012]. The title of French is “Method and System for Managing Resources using Geographic Location Information within a Network Management Framework.” Id. Title. Like the

endpoint or router, French's "system" is not the same as "the first printer driver record," as recited in claim 1.

The second portion of French states:

Scope configuration is important to the proper operation of the IP drivers because IP drivers assume that there are no overlaps in the drivers' scopes. Since there should be no overlaps, every IP driver has complete control over the objects within its scope. A particular IP driver does not need to know anything about the other IP drivers because there is no synchronization of information between IP drivers. The configuration service provides the means to allow the DKS components to store and retrieve configuration information for a variety of other services from anywhere in the networks. In particular, the scope configuration will be stored in the configuration services so that IP drivers and other applications can access the information.

Id. at paragraph [0125]. Nothing in this second cited portion discloses anything about "the first printer driver record," as recited in claim 1. Rather, this second cited portion states that "[a] particular IP driver does not need to know anything about the other IP drivers because there is no synchronization of information between IP drivers." This suggests that there is no relationship between the IP drivers of French. Therefore, this second cited portion also fails to disclose "the first printer driver record," as recited in claim 1. Furthermore, the Office Action has not cited, nor can Applicant find, any portion of French that discloses "the first printer driver record," as recited in claim 1.

In view of the foregoing, Applicant respectfully submits that claim 1 is patentably distinct from French. Accordingly, Applicant respectfully requests that the rejection of claim 1 be withdrawn. Claim 17 includes similar limitations as claim 1. Applicants respectfully request that the rejection of claim 17 be withdrawn for at least the same reasons as those presented above in connection with claim 1.

Claims 2-11 depend either directly or indirectly from claim 1. Accordingly, Applicant respectfully requests that the rejection of claims 2-11 be withdrawn for at least the same reasons as those presented above in connection with claim 1.

The Office Action rejected claims 12-15 and 16 stating that “these claims are rejected on grounds corresponding to the arguments given above for rejected claims 1-4 and 8.” Office Action, page 3. Applicant respectfully submits that though claims 1, 12, and 16 include some limitations that are similar, they are distinct claims. For example, claims 12 and 16 recite “joining the MFP database and the printer driver database in a many-to-many relationship.” Claim 1 does not recite this limitation, as recited in claims 12 and 16. Furthermore, the Office Action has not cited, nor can Applicant find, any portion of French that discloses joining databases, as recited in claims 12 and 16. Therefore, Applicant respectfully submits that claims 12 and 16 are patentably distinct from French. Accordingly, Applicant respectfully requests that the rejection of claims 12 and 16 be withdrawn.

Claims 13-15 depend either directly or indirectly from claim 12. Accordingly, Applicant respectfully requests that the rejection of claims 13-15 be withdrawn for at least the same reasons as those presented above in connection with claims 12 and 16.

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Reply to Office Action of September 6, 2006

**B. Conclusion**

Applicants respectfully assert that all pending claims are patentably distinct from the cited references, and request that a timely Notice of Allowance be issued in this case. If there are any remaining issues preventing allowance of the pending claims that may be clarified by telephone, the Examiner is requested to call the undersigned.

Respectfully submitted,



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